

12. State whether or not there have been any design modifications since the 2015 X-stand model XSCT334 Silent Adrenaline was first manufactured. If so, state the reason or reasons for said design modifications and the person most knowledgeable about said modifications.

ANSWER: Defendants object to this request which is overly broad and not reasonably calculated to lead to the discovery of admissible evidence. Defendants further object to the extent this request seeks information related to any subsequent remedial measures taken by Defendants and because Plaintiff has not alleged that any design modification caused Plaintiff's injuries. Subject to and without waiving these objections, in 2017, the manufacturer switched cable component suppliers to a new entity. In 2018 Defendant began working with a new manufacturer, which increased the thickness of the rubber coating on the cables, and enlarged the receiving channel for the cable.

SUPPLEMENTAL ANSWER: Subject to the forgoing objections, the manufacturers of the model stand and cable by date are as follows:

Stand Manufacturers:

- 2015-2017 YANGZHOU CHAORUI AUTO PARTS CO.,LTD.
 - Address: No.1 Nanzhuang Road, Xihu Town, Yangzhou, 225009, Jiangsu P.R., China
- 2018-2020 Yangzhou Superman Sporting Equipment Co, LTD
 - Address: Guangling Industrial Park, Guangling District, Yangzhou 225000, Jiangsu, China

Steel Cable/Wire rope supplier:

- 2015-2016 Cables manufactured and supplied by a component supplier to YANGZHOU CHAORUI AUTO PARTS CO.,LTD – name and address unknown.
- 2017 YANGZHOU CHAORUI AUTO PARTS CO.,LTD.
 - Address: No.1 Nanzhuang Road, Xihu Town, Yangzhou, 225009, Jiangsu P.R., China
- 2018-2020 Yangzhou Superman Sporting Equipment Co, LTD
 - Address: Guangling Industrial Park, Guangling District, Yangzhou 225000, Jiangsu, China

